

CP:BSK
F. #2004R01800/OCDEF #NYYE288

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ NOV 04 2008 ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BROOKLYN OFFICE

- - - - - X

UNITED STATES OF AMERICA

S U P E R S E D I N G
I N D I C T M E N T

- against -

LUIS CARLOS BELTRAN-CRISTANCHO,
also known as
"Negro Rambo,"
GABRIEL JAIME HERRERA VILLADA,
also known as "Jimmy"
and "W,"
ALDEMAR ALVAREZ,
also known as "Pelon" and
"Alex," and
GUILLERMO LEON OTALVARO CASTRILLON,
also known as "Librito,"

Cr. No. 04-749 (S-3) (JG) (VVP)
(T. 21, U.S.C., §§
841(b)(1)(A)(ii)(II), 846,
853, 959(c), 960(a)(1),
960(a)(3), 960(b)(1)(B)(ii)
and 963; T. 18, U.S.C., §§
982, 1956(h) and 3551 et
seq.)

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

COUNT ONE
(Conspiracy to Distribute Cocaine)

1. In or about and between 1990 and December 2007,
both dates being approximate and inclusive, within the Eastern
District of New York and elsewhere, the defendants LUIS CARLOS
BELTRAN-CRISTANCHO, also known as "Negro Rambo," GABRIEL JAIME
HERRERA VILLADA, also known as "Jimmy" and "W," ALDEMAR ALVAREZ,
also known as "Pelon" and "Alex," and GUILLERMO LEON OTALVARO
CASTRILLON, also known as "Librito," together with others, did
knowingly and intentionally conspire to distribute and possess
with intent to distribute a controlled substance, which offense

involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO
(Conspiracy to Import Cocaine)

2. In or about and between 1990 and December 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LUIS CARLOS BELTRAN-CRISTANCHO, also known as "Negro Rambo," GABRIEL JAIME HERRERA VILLADA, also known as "Jimmy" and "W," ALDEMAR ALVAREZ, also known as "Pelon" and "Alex," and GUILLERMO LEON OTALVARO CASTRILLON, also known as "Librito," together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 952(a).

(Title 21, United States Code, Sections 963, 960(a)(1) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 3551 et seq.)

COUNT THREE
(International Distribution Conspiracy)

3. In or about and between 1990 and December 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LUIS CARLOS BELTRAN-CRISTANCHO, also known as "Negro Rambo," GABRIEL JAIME HERRERA VILLADA, also known as "Jimmy" and "W," ALDEMAR ALVAREZ, also known as "Pelon" and "Alex," and GUILLERMO LEON OTALVARO CASTRILLON, also known as "Librito," together with others, did knowingly and intentionally conspire to distribute a controlled substance, intending and knowing that such substance would be imported into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 959(a).

(Title 21, United States Code, Sections 963, 959(c), 960(a)(3) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 3551 et seq.)

COUNT FOUR
(Conspiracy to Launder Money)

4. On or about and between January 1, 2004 and December 31, 2007, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALDEMAR ALVAREZ, also known as "Pelon" and "Alex," together with others, did knowingly and intentionally conspire to conduct financial transactions in and affecting interstate and

foreign commerce, to wit: the transfer and delivery of United States currency, which in fact involved the proceeds of specified unlawful activity, to wit: narcotics trafficking, in violation of Title 21, United States Code, Sections 841(a)(1), 846, 963, 960(a)(1), 959(c) and 960(a)(3), knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE THROUGH THREE

5. The United States hereby gives notice to the defendants charged in counts one through three that, upon their conviction of any such offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853, which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such

offenses, including but not limited, the following:

Money Judgment

A sum of money equal to at least approximately \$450 million in United States currency.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Section 853)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT FOUR

7. The United States hereby gives notice to the defendant charged in Count Four that, upon his conviction of such offense, the government will seek forfeiture in accordance with

Title 18, United States Code, Section 982, of all property involved in each offense of conviction in violation of Title 18, United States Code, Section 1956, or conspiracy to commit such offense, and all property traceable to such property as a result of the defendant's conviction of any such offense, including but not limited to, the following:

Money Judgment

A sum of money equal to to at least approximately \$450 million in United States currency.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18,


United States Code, Section 982, to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982)

A TRUE BILL


FOREPERSON

BENTON J. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.136

NO. F. # 2004R01800/OCDETF #N9NYE288

UNITED STATES DISTRICT COURT

EASTERN District of **NEW YORK**

THE UNITED STATES OF AMERICA

vs.

LUIS CARLOS BELTRAN-CRISTANCHO,
a/k/a "Negro Rambo," GABRIEL JAIME HERRERA
VILLADA, a/k/a "Jimmy" and "W,"
Aldemar alvarez, a/k/a "Pelon" and "Alex,"
and GUILLERMO LEON OTALVARO CASTRILLON,
a/k/a "Librito,"

Defendants.

SUPERSEDING INDICTMENT

Cr. No. 04-749 (S-3) (JG) (VVP)
(T. 21, U.S.C., §§ 841(b)(1) (A) (ii) (II), 846, 853, 959 (c), 960(a)(1)
960(a)(3), 960(b)(1) (B) (ii) and 963; T. 18, U.S.C., §§ 982, 1956(h)
And 3551 et seq.)

A true bill.

Foreman

Filed in open court this _____ day.
Of _____ A.D. 19 _____

Clerk

Bail, \$ _____

BONNIE KLAPPER, AUSA 718-254-6426